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U.S. Citizenship and Immigration Services,
11 Joseph Edlow¹, Sara M. French, Susan Dibbins

12 UNITED STATES DISTRICT COURT
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA
14

15 ROCAEL EDUARDO CAMARGO
GOMEZ,

16 Plaintiff,

17 v.

18 U.S. CITIZENSHIP AND
19 IMMIGRATION SERVICES (USCIS);
ANGELICA ALFONSO-ROYALS,
20 Acting Director, USCIS; SARA M.
FRENCH, Director, USCIS Buffalo
21 Field Office; SUSAN DIBBINS, Chief,
USCIS Administrative Appeals Office,

22 Defendants.
23

No. 2:25-cv-05218-JC

JOINT RULE 26(f) REPORT

Scheduling Conference

Date: December 30, 2025

Time: 10:00 a.m.

Courtroom: via Zoom

Honorable Jacqueline Chooljian
United States Magistrate Judge

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28 ¹ Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Joseph Edlow,
Director of USCIS, is substituted for former Acting Director Angelica Alfonso-Royals.

1 Pursuant to Rule 26(f) of the Federal Rules of Civil Procedure, Rule 26-1 of the
2 Local Rules of the Central District of California, and the Court’s Order Setting
3 Scheduling Conference (ECF 20), the parties hereby jointly submit this report. On
4 December 8, 2025, the undersigned counsel met and conferred on this plan
5 telephonically.

6 **A. Statement of the Case**

7 Plaintiff Rocael Eduardo Camargo Gomez brought this action pursuant to the
8 Administrative Procedure Act (“APA”) challenging the United States Citizenship and
9 Immigration Services (“USCIS”) Administrative Appeals Office (“AAO”) March 14,
10 2025 dismissal of his appeal of USCIS’s denial of his I-212 Application for Permission
11 to Reapply for Admission into the United States After Deportation or Removal. Under
12 the APA, judicial review of a final agency action is limited to the administrative record
13 of the proceedings below.

14 **B. Subject Matter Jurisdiction**

15 The Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1331 (federal
16 question).

17 **C. Legal Issues**

18 Whether the AAO’s March 14, 2025 decision dismissing Plaintiff’s appeal of
19 USCIS’s denial of his I-212 Application was arbitrary, capricious, an abuse of discretion,
20 or not in accordance with law. 5 U.S.C. § 706(2)(A).

21 **D. Parties, Evidence, etc.**

22 Plaintiff is Rocael Eduardo Camargo Gomez.

23 Defendants are United States Citizenship and Immigration Services; Joseph
24 Edlow, Director of USCIS; Sara M. French, Director, USCIS Buffalo Field Office; and
25 Susan Dibbins, Chief, USCIS Administrative Appeals Office.

26 The legal issues in this case will be decided based on a review of the Certified
27 Administrative Record without discovery.

1 **E. Damages**

2 There are no claims for damages in this administrative record review action.

3 **F. Insurance**

4 Insurance is not involved in this administrative record review action.

5 **G. Motions**

6 The parties do not anticipate filing motions to add parties or claims, amend
7 pleadings, or transfer venue.

8 **H. Manual for Complex Litigation**

9 The parties do not believe that this case is complex. This case does not require
10 reference to the procedures set forth in the Manual for Complex Litigation.

11 **I. Status of Discovery**

12 This is an administrative record review case. The legal issues in this case will be
13 decided based on a review of the Certified Administrative Record without discovery.

14 **J. Discovery Plan**

15 A discovery plan is not necessary for this case. This is an administrative record
16 review case. The legal issues in this case will be decided based on a review of the
17 Certified Administrative Record without discovery.

18 This case is exempt from initial disclosures under Rule 26(a)(1)(B)(i) of the
19 Federal Rules of Civil Procedure.

20 To prevent unauthorized access to Plaintiff's personal, financial, and immigration
21 records, the parties agree that Defendants will file the Certified Administrative Record
22 with the Court under seal, with disclosure made to Plaintiff for the purposes of this
23 litigation pursuant to an Order of this Court.

24 **K. Discovery Cut-Off**

25 This is an administrative record review case. The legal issues in this case will be
26 decided based on a review of the Certified Administrative Record without discovery.

27 **L. Expert Discovery**

28 This is an administrative record review case. The legal issues in this case will be

1 decided based on a review of the Certified Administrative Record without discovery,
2 including expert discovery.

3 **M. Dispositive Motions**

4 The legal issues in this case can be decided and fully resolved based on review of
5 the Certified Administrative Record to be filed. The Court's review is limited to the
6 Certified Administrative Record on which the agency based its decision. *See* 5 U.S.C.
7 § 706; *Camp v. Pitts*, 411 U.S. 138, 142 (1973). The Court may direct judgment based
8 on its review of the Certified Administrative Record and briefing submitted by the
9 parties. *See Lands Council v. Powell*, 379 F.3d 738, 743 (9th Cir. 2004), *amended by* 395
10 F.3d 1019 (9th Cir. 2005).²

11 Plaintiff bears the burden of proof in this action. The parties propose the following
12 briefing schedule:

13	Plaintiff's Opening Brief:	April 21, 2026
14	Defendants' Responding Brief:	May 19, 2026
15	Plaintiff's Reply Brief:	June 2, 2026
16	Defendants' Sur-Reply (if any):	June 16, 2026
17	Hearing (9:30 a.m.)	Tuesday, June 30, 2026

18 **N. Settlement**

19 Because this administrative record review case involves only legal issues to be
20 resolved based on review of the Certified Administrative Record, the parties request that
21 this action be exempted from the settlement requirements of Local Rule 16.

22 In the event the parties are required to select one of the ADR Procedures specified
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25 ² In administrative record review cases like this one, courts in this district
26 regularly proceed by briefing on the Certified Administrative Record rather than
27 summary judgment motions. *See, e.g., All Saints Anglican Church of Los Angeles v.*
28 *USCIS*, Case No. CV 24-08170-CAS-MAA, ECF 18 (C.D. Cal. Mar. 10, 2025) (setting a
briefing schedule with four briefs in a record review case); *Shompiyev v. Garland*, Case
No. 2:21-cv-05714-GW-KES, ECF 15 (C.D. Cal. Nov. 24, 2021) (same); *Really Epic*
Dog, Inc. v. U.S. Citizenship & Immigr. Servs., Case No. 2:21-cv-02784-SB-GJS, ECF
44 (C.D. Cal. June 1, 2021) (same); *Ubiquity Press Inc. v. Baran*, Case No. 8:20-cv-
01809-JLS-DFM, ECF 32 (C.D. Cal. Feb. 2, 2021) (same).

1 in Local Rule 16-15.4, the parties request to appear before a neutral selected from the
2 Court's Mediation Panel.

3 **O. Trial Estimate**

4 Because this is an administrative record review case that involves only legal issues
5 to be resolved based on review of the Certified Administrative Record, there will be no
6 trial. The Court may direct judgment based on its review of the Certified Administrative
7 Record and briefing submitted by the parties. *See Lands Council v. Powell*, 379 F.3d
8 738, 743 (9th Cir. 2004), *amended by* 395 F.3d 1019 (9th Cir. 2005).

9 **P. Trial Counsel**

10 Plaintiff is represented by Carlo Brooks.

11 Defendants are represented by Assistant United States Attorney Margaret M.
12 Chen.

13 **Q. Independent Expert**

14 The parties agree that an independent expert or master will not be necessary.

15 **R. Timetable**

16 The parties' Exhibit A Schedule of Pretrial and Trial Dates is attached. As this
17 action will be decided based on the Certified Administrative Record, there will not be a
18 trial in this action. Instead, the legal issues in this case will be fully resolved based on the
19 parties' legal arguments set forth in the briefing conducted pursuant to the proposed
20 briefing schedule.

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S. Other Issues

There are no other issues affecting the status or management of the case at this time.

Dated: December 10, 2025

Respectfully submitted,

TODD BLANCHE
Deputy Attorney General
BILAL A. ESSAYLI
First Assistant United States Attorney
DAVID M. HARRIS
Assistant United States Attorney
Chief, Civil Division
DANIEL A. BECK
Assistant United States Attorney
Chief, Complex and Defensive Litigation Section

/s/ Margaret M. Chen
MARGARET M. CHEN
Assistant United States Attorney

Attorneys for Defendants
U.S. Citizenship and Immigration Services,
Joseph Edlow, Sara M. French, Susan Dibbins

Dated: December 10, 2025

THE BROOKS LAW FIRM, APC

/s/ Carlo Brooks*
CARLO BROOKS

Attorneys for Plaintiff
Rocael Eduardo Camargo Gomez

* Pursuant to Local Rule 5-4.3.4(2), the filer attests that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's contents and have authorized the filing.

SCHEDULE OF PRETRIAL AND TRIAL DATES

CASE NAME: Rocael Eduardo Camargo Gomez v. USCIS, et al.

CASE NO: 2:25-cv-05218-JC

Matter	Time	Weeks before trial	Plaintiff(s) Request	Defendant(s) Request	Court Order
Trial (jury)(court) (length ___ days) (Tuesday)	10:00 am		N/A	N/A	
<u>For Court Trial</u> Lodge Findings of Fact and Conclusions of Law, LR 52, and Summaries of Direct Testimony		3	N/A	N/A	
Pretrial Conference, LR 16; Hearing on Motions in Limine	1:30 pm	4	N/A	N/A	
<u>For Jury Trial</u> Lodge Pretrial Conference Order, LR 16-7; File Agreed Set of Jury Instructions and Verdict Forms; File Statement Regarding Disputed Instructions, Verdicts, etc.; File Oppositions to Motions in Limine		6	N/A	N/A	
<u>For Jury Trial</u> File Memo of Contentions of Fact and Law, LR 16-4; Exhibit & Witness Lists, LR 16-5, 6; File Status Report Regarding Settlement; File Motions in Limine		7	N/A	N/A	
Last date to conduct Settlement Conf., LR 16-15		12	N/A	N/A	
Last day for hearing motions, LR 7		14	N/A	N/A	
Non-expert Discovery Cut-off			N/A	N/A	
Expert Disclosure (initial)			N/A	N/A	
Expert Disclosure (rebuttal)			N/A	N/A	
Expert Discovery Cut-off			N/A	N/A	
Last Date to Amend Pleadings or Add Parties			1/27/2026	1/27/2026	
Hearing on Briefs re: Administrative Record			6/30/2026	6/30/2026	

LR 16-15 Settlement Choice:

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1. USMJ

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3. Outside ADR

The parties request to be exempted from the settlement requirements of Local Rule 16. In the event that the parties are required to go to ADR, the parties request Attorney Settlement Panel.

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2. Attorney Settlement Panel

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4. Judge Chooljian

Exhibit A